

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

United States of America,

Court File No. 15-mj-399 (JSM)-1

Plaintiff,

v.

AFFIDAVIT OF RAY JAMES

Search Warrant,

Defendant.

STATE OF MINNESOTA)
) ss:
COUNTY OF HENNEPIN)

I, Ray James, after being duly sworn, hereby swear and affirm as follows:

1. On May 12, 2015 I was attempting to board a flight to California from Minnesota when I was approached by law enforcement. The officers wanted to talk to me and were interested in searching my carry on bag.
2. I told the officers that my plane was boarded and ready to take off. I didn't want to miss my flight and I refused to let them search my bag.
3. The officers told me that I would probably miss the flight and I should accompany them to an interview room. They told me that the friend I was traveling with was being investigated for something. The officers suspected that he might have drugs or cash on him, and they wanted to see what was in my bag.
4. When the officers approached me, I had already passed through the TSA security check point without any problems.

5. I did not give consent for the officers to search the bag and I asked to stay in the main hallway area for the discussion. They never arrested me, but I didn't feel free to leave unless I gave up my bag.
6. Eventually, the officers took my carry-on bag and gave me a receipt for it. They told me I could pick up my property in a few days after they search it and decide if anything should be seized. I was free to leave at that point, but I had missed my flight.
7. I am in the business of buying and selling used cars. The purpose of my trip on May 12, 2015 was to go to California to attend a car auction. I had \$20,000.00 in cash with me to purchase a vehicle that I could bring back to Minnesota for resale. The reason I had cash is because at an auction sellers are usually more motivated to work out a deal when they can have cash for the vehicle on the spot.
8. The cash I had was a loan from an investor at Mainstreet Lending, LLC. On February 25, 2015 I deposited \$39,000.00 into my U.S. Bank account. A copy of my bank deposits is attached to this affidavit. This money was to be used to purchase vehicles.
9. I withdrew \$35,500.00 between February 25 and March 24, 2015 for use with my business. I budgeted \$20,000.00 to bring with me to California.
10. The seizure of my money has been a big problem for me and I can say that it has caused "irreparable injury." I cannot use the money to purchase a vehicle. I have to pay the money back at some point, but I cannot do that now. The investor and I probably will not work together if I can't get this figured out.

11. I am told that a civil forfeiture action may be filed, but I have not been served with a paperwork as of this date. I do not believe that I have any other recourse but to file this motion.

I need this property returned to me promptly.

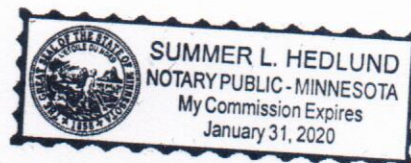
12. The Government has totally ignored my rights by taking the bag at the airport without justification and then seizing my cash and phone. I am not charged with a crime and I am not engaged in criminal activity with this money. It is not drug proceeds. There is nothing on my phone that ties me to criminal activity.

13. I am asking the Court to order the Government to return my cash and my cell phone as soon as possible.


Ray James

Subscribed and sworn to before me
this 5 day of June, 2015.


Notary Public



Silver Business Checking
Account ending in 7740

Date Printed: 05/20/15

Printed By: DLCHAND

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ACCOUNT BALANCE	AVAILABLE BALANCE
\$3,575.00	\$3,575.00

Post Date Trans Time	Trace ID/Ref Num	Description	Check #	Debit	Credit	Account Balance	Available Balance	Unavailable Funds
05-14-15 1:16:00 PM	115051400000000	ANALYSIS SERVICE CHARGE - DEBIT		\$3.00	\$0.00	\$3,575.00	\$3,575.00	
04-14-15 1:16:00 PM	115041400000000	ANALYSIS SERVICE CHARGE - DEBIT		\$3.00	\$0.00	\$3,578.00	\$3,578.00	
03-24-15 1:01:00 AM	16008355196543	TELLER SAVINGS WITHDRAWAL		\$8,000.00	\$0.00	\$3,581.00	\$3,581.00	
03-13-15 1:16:00 PM	115031300000000	ANALYSIS SERVICE CHARGE - DEBIT		\$19.00	\$0.00	\$11,581.00	\$11,581.00	
03-09-15 1:22:00 AM	15178054730883	TELLER SAVINGS WITHDRAWAL		\$9,000.00	\$0.00	\$11,600.00	\$11,600.00	
03-02-15 1:22:00 AM	14928054525663	TELLER SAVINGS WITHDRAWAL		\$2,500.00	\$0.00	\$20,600.00	\$20,600.00	
03-02-15 1:22:00 AM	15038054612427	TELLER SAVINGS WITHDRAWAL		\$7,000.00	\$0.00	\$23,100.00	\$23,100.00	
02-26-15 00:00 AM	12918953066867	TELLER SAVINGS WITHDRAWAL		\$9,000.00	\$0.00	\$30,100.00	\$30,100.00	
02-25-15 19:00 PM		WT01 REF000029 BREMER BANK NATL A 150225		\$0.00	\$39,000.00	\$39,100.00	\$39,100.00	
02-24-15 23:00 AM	13138354000421	CUSTOMER DEPOSIT		\$0.00	\$100.00	\$100.00	\$100.00	

EXHIBIT TO
AFFIDAVIT

This is informational only. It does not constitute your official statement.

of  serving you™

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Form TRHIST 092012

U.S. Bank
Customer Confidential